SUMMARY MINUTES

of the

BRITISH PHARMACOPOEIA COMMISSION

A meeting of the British Pharmacopoeia Commission was held via videoconference on Monday 6th July 2020.

Present: Professor K Taylor (*Chair*), Professor A G Davidson (*Vice-Chair*), Dr E Amirak, Dr A Barnes, Dr J Beaman, Dr A M Brady, Dr G Cook, Dr A Gleadle (*lay member*), Dr V Jaitely, Mr R Lowe, Dr P Marshall, Professor J Miller, Ms S Palser (*lay member*), Professor M Simmonds, Dr R Torano and Dr P Varley.

In attendance: Mr J Pound (*Secretary & Scientific Director*), Dr F J Swanson.

Also present: Ms H Ashraf, Dr H Bowden, Ms H Corns, Mr L Elanganathan, Mr A Evans, Mr A Gibb, Mr G Kemp, Ms G Li-Ship, Mr S Maddocks, Mr R Smith, Mr M Whaley and Mr S Young.

Dr Moira Francois and Dr Ryan McCoy, secondees from the Cell and Gene Therapy Catapult, attended the meeting for the item recorded under minute 391.

384 **Introductory Remarks**

Welcome The Chair welcomed members to the meeting. He especially welcomed the new members who were attending their first meeting and introduced themselves to the Commission (Dr Emre Amirak, Dr Andrew Barnes, Dr Vikas Jaitely and Dr Paul Marshall).

Declaration of Interests; Confidentiality of Proceedings Members were reminded of the need to inform the Secretariat of any changes to their interests throughout the year and of the need to declare any specific interests at the start of relevant discussions. The Chair reminded members of the confidential nature of the meeting and that the papers should not be disclosed.

I MINUTES

385 The minutes of the meeting held on 6th April 2020 were confirmed.

II MATTERS ARISING FROM THE MINUTES

386 The following matters arising from the meeting held on 6th April 2020 were noted.

Minute 356 – BPC Appraisals The appraisals had been carried out by correspondence and the completed forms had been returned to the Department of Health and Social Care.

Minute 358 – Expression of Related substances Limits; Minute 358 – New Analytical Technologies Consultations on the proposed introduction of (i) numerical limits, (ii) LC/UV-DAD identification methods and (iii) the use of pulsed amperometric detection methods into BP monographs had been posted on the BP website on 1st July and would be open for comment until 30th September 2020.

Minute 367 – British Pharmacopoeia 2021 Publications The second batch of text for the BP 2021 publications had been reviewed in April. The Chair thanked the Secretariat and

members for their efforts to ensure that the preparation and review of the text had been completed on time.

III REPORTS AND CORRESPONDENCE

GOVERNANCE

387 **Coronavirus**

Mr Pound provided an update on how the BP and MHRA were responding to the current global Coronavirus (Covid-19) outbreak.

388 **Change Strategy; Operational Transformation**

Mr Pound provided an update on current strategic developments within the MHRA.

OPERATIONAL

389 **British Pharmacopoeia Commission: Membership** COM(20)21

A review of the membership of the British Pharmacopoeia Commission had been undertaken during 2019, in collaboration with the Department of Health and Social Care Public Appointments Unit. Seven members had been re-appointed with effect from 1st January 2020. The process to appoint new members had been delayed due to the impact of Covid-19, but the four new members had now been appointed with effect from 22nd June for a period of four years. Ministerial approval had also been received confirming the re-appointment of Dr Graham Cook for a final two-year term, which had been backdated to 1st January 2020. A list detailing the terms of office for all current members was provided for information.

390 **Innovation Board** COM(20)22

Members were provided with an update on the recent progress made by the joint BP-TSO Innovation Board.

Track Changes The first phase of the online track changes project had been implemented on 1st April 2020. This allowed users to choose between viewing clean text or viewing text with symbols highlighting where the monograph had been changed and/or showing the detail of the changes. Positive feedback from users had been received.

User Research The research carried out to date had helped inform recent improvements to the BP website and online BP, including the “How to Use the BP” guide, the updated timeline and track change features. Members were invited to suggest other areas that could be explored.

Discussion There was a lot of communication with companies around new and revised monographs and it was suggested that they should be encouraged to provide feedback on other pharmacopoeial issues on a regular basis. It was also suggested that it might be useful for the BP proactively to seek the views of organisations such as the European Federation of Pharmaceutical Industries and Associations (EFPIA) and the Association of the British Pharmaceutical Industry (ABPI), as this would represent the views of many companies, and members concurred. The archive feature, providing previous versions of a monograph dating back to the BP 2014 was valued, as was the access to omitted monographs.

391 **Progress Report: Advanced Therapy Medicinal Products** COM(20)23

The Working Party on Advanced Therapy Medicinal Products (WP ATMP) had held its first meeting in April and members were provided with an update on recent activities.

Ways of working The Working Party had recommended that non-mandatory guidance should be published in key areas and that this should be developed through sub-groups consisting of relevant experts. Members had endorsed the proposed ways of working by correspondence, together with the membership of the sub-groups on Flow Cytometry and Vector Copy Number.

Cell and Gene Therapy Catapult Secondment The BP was currently participating in a secondment programme which benefitted the BP and MHRA by placing relevant expertise within the Secretariat and by strengthening the links between the Agency and the Catapult network.

Dr McCoy gave a presentation on the work of the Cell and Gene Therapy Catapult, which was part of the Catapult Network of technology and innovation centres set up by the UK Government.

International Collaboration and Engagement Mr Gibb highlighted recent activities which had included bilateral meetings between the MHRA and the US Food and Drug Administration, the US Standards Coordinating Body and the National Institute of Standards and Technology which had focussed on knowledge sharing and collaboration in the area of ATMPs. The MHRA continued to support the work of the European Pharmacopoeia in this area through membership of relevant Groups of Experts and Working Parties.

392 **Expert Advisory Groups PCY and NOM: Future Direction** COM(20)24

As part of the comprehensive review of EAG membership undertaken in 2018, members had considered a proposal to merge the current Expert Advisory Groups on Nomenclature (NOM) and Pharmacy (PCY). Several concerns had been expressed and it had been agreed that the two EAGs should remain separate but that the matter should be reviewed at a later date. The matter had been discussed at the recent EAG PCY meeting (May 2020) where the consensus had been that a merged group was preferred. The Chair of EAG NOM had supported the proposed merger of the two EAGs.

Areas of expertise EAG members were chosen for their specific areas of expertise and it was noted that, within any one EAG, there were individuals with a range of different expertise to enable the EAG to fulfil its role. It was recognised that certain issues could potentially fall within the remit of either EAG PCY, EAG NOM or both groups.

Recent issues The Secretariat had provided several examples of recent issues that could potentially have been resolved more efficiently if the expertise of both NOM and PCY members had been combined.

EAG Remit; Membership By merging the role and remit of both groups into a single EAG with a wider and more focussed remit, this would help to speed up critical decisions that would ultimately benefit patients.

Members agreed that a strong justification to merge the two EAGs had been presented and that going forward this should facilitate reaching appropriate decisions in a timely manner. Members endorsed the recommendation to merge EAGs NOM and PCY, with the proviso that this should be reviewed after one year.

393 **Unlicensed Medicines: Progress Report** COM(20)25

An update on the recent activities of the Expert Advisory Group on Unlicensed Medicines was provided for information. Since the last update provided in 2014 a further 28 monographs for unlicensed formulations had been published in the annual editions of the British Pharmacopoeia. It was challenging to obtain sufficient information to support the monograph development work and also to ensure that samples were available in a timely manner for laboratory evaluation. In view of these difficulties the EAG had been looking at alternative ways to add value to users in the form of additional Supplementary Chapters.

394 **EAG ULM: Additional Guidance and New Monographs** COM(20)26

The Expert Advisory Group on Unlicensed Medicines had recently expanded their work programme to include additional areas to benefit users.

Ready to Administer Injections A new section on Ready to Administer Injections had been prepared by the Chair of EAG ULM for inclusion in Supplementary Chapter V F: Aseptic Preparation of Unlicensed Medicines. This was intended for inclusion in a future edition of the BP and members would be invited to comment on the draft text in due course.

Monographs for Buffered Antibiotics Members endorsed the recommendation of EAG ULM to develop separate monographs for unlicensed buffered formulations, where these were justified by supporting data.

395 **Nitrosamines: Recent Activities** COM(20)27

Members were provided with an update on recent activities relating to the detection of nitrosamines in drug substances and formulated preparations.

396 **British Pharmacopoeia Laboratory** COM(20)28

British Pharmacopoeia Laboratory Reports The list of reports concerning new and revised monographs that had been prepared by the Laboratory since the April 2020 meeting was provided for information.

British Pharmacopoeia Chemical Reference Substances Tables providing information on BPCRS up to the end of May 2020 were provided for information.

BPCRS Monitoring in Response to Covid-19 The Laboratory had introduced enhanced monitoring for 138 BPCRS associated with medicines that might be used for the treatment of Covid-19.

Restrictions on the amount of around 30 BPCRS supplied to purchasers had been imposed to ensure that the supply of these materials could be maintained.

397 **Assessing the Impact of Out of Stock BPCRS** COM(20)29

Discussion Members were invited to discuss the impact of out of stock items.

It was agreed that the Secretariat would take time to consider the points raised with a view to introducing improved methods of BPCRS stock control.

398 **BPCRS: Establishment, Replacement and Omission** COM(20)30

A member had proposed a set of “Principles for the Establishment, Replacement and Omission of BPCRS”.

Many of the draft principles reflected current practices and were endorsed. It was agreed that minor changes could be introduced. The Secretariat would update the document based on the comments received and the principles would be used to help define the future policy.

IV FUTURE PUBLICATIONS

399 **Rapid Revision of BP Monographs** COM(20)31

Effective dates The overall effective date of each edition of the BP and BP (Vet) was 1st January 20XX. National monographs were brought into effect under the Human Medicines Regulations 2012, which require that notification of the effective date should be published in the London, Edinburgh and Belfast Gazettes at least 21 days in advance of implementation.

Revisions to BP Monographs Stakeholders were made aware of future monograph revisions via the BP website consultation window and were therefore aware of any changes before publication and implementation. There were, however, occasions when manufactures were unable to comply with current monographs. In these instances, the BP sometimes issued a “letter of intent to revise a monograph” which included the details of the revision, together with the edition of the BP in which the change would be published and the effective date. Such documents did not have any legal basis but could be used by manufacturers in discussions with the regulator relating to non-compliance.

Rapid Revisions It had been agreed to amend the monograph for Fentanyl Injection to remove the requirement to use a BPCRS. This issue had arisen at a late stage in the publication cycle. The Secretariat and Laboratory had worked closely together to resolve the issue and it had been possible to amend the monograph before the BP 2021 text had been “signed-off” for publication. The updated text had been approved by the relevant EAG (MC1) and the Chair and Vice-Chair of Commission and a letter of intent had been issued.

It was possible that there could be exceptional circumstances in the future that would require the rapid revision of a monograph either after the publication had been signed-off but not published, published but not yet implemented or after the implementation date. The Secretariat had identified the key steps for the different scenarios. It was stressed that there were many factors to consider and the necessary actions would depend on when the need to amend a monograph was identified and how urgent it was for the change to be made.

Members endorsed the proposals from the Secretariat.

400 **Action and Use Statements** COM(20)32

Background The responsibility for devising action and use statements for inclusion in the British Approved Names (BAN) publication and the British Pharmacopoeia currently falls within the remit of EAG NOM: Nomenclature and will in future form part of the remit of the newly merged NOM/PCY EAG (minute 392 refers).

BP Statements The statements in BP monographs are taken from the BAN publication. These were originally only included in monographs for medicinal substances, but from the

BP 2008 onwards the same statements were also included in monographs for formulated preparations, as this is what the patient receives.

Changes over time The action and/or use of a particular drug might change over time and this should be taken into consideration when a monograph is prepared or updated. There were cases where different formulations of the same active ingredient were used for different purposes. There was a similar situation for unlicensed medicines where unlicensed formulations may be used to treat different indications than licensed products containing the same active ingredient.

Review Following comments received on various action and use statements at the document review stage, preliminary discussions on the continued inclusion of the statements in BP monographs were held at the recent EAG PCY: Pharmacy meeting. Members of PCY had recommended that the statements should be retained, as they provided valuable information to analysts, but that they should be reviewed and updated where appropriate to reflect current information. It had been agreed that this aspect should be reviewed for all new and revised monographs for each BP publication.

Members endorsed the recommendation that the new NOM/PCY EAG should be asked to review the statements for new and revised BP monographs in future publications and that an appropriate amendment should be made to the General Notice on Action and Use.

V ANALYTICAL ISSUES

None.

VI EXPERT ADVISORY GROUPS / PANELS OF EXPERTS

401 **Expert Advisory Group HCM: Herbal and Complementary Medicines** COM(20)33

The report of the EAG HCM meeting (27:11:19) was approved.

402 **Expert Advisory Group ABS: Antibiotics** COM(20)34

The report of the EAG ABS meeting (31:03:20) was approved.

403 **Working Party ATMP: Advanced Therapy Medicinal Products** COM(20)35

The report of the WP ATMP meeting (14:04:20) was approved.

VII EUROPEAN PHARMACOPOEIA

404 **European Pharmacopoeia Update** COM(20)36

European Pharmacopoeia Commission Members discussed items from the 166th and 167th Sessions of the EP Commission and advised the UK Delegation accordingly.

Questionnaires sent to the UK National Authority A list of the recent questionnaires relating to proposals to add items to or remove items from the Ph Eur work programme was presented for information.

VIII INTERNATIONAL COLLABORATION

405 **International Update** COM(20)37

Members were provided with an update on international activities.

Many international meetings had either been cancelled or postponed due to the current pandemic. However, several meetings had been able to take place, albeit remotely, and the BP had actively participated in these meetings.

International Meeting of World Pharmacopoeias (IMWP) Review Meetings Mr Pound and Mr Gibb had attended a series of sub-group meetings held between representatives of the various IMWP participating pharmacopoeias.

United States Pharmacopeia Mr Pound, Mr Evans and Mr Gibb had held a teleconference with the USP to discuss areas of mutual interest including informal harmonisation projects for finished product monographs.

70th International Nonproprietary Names Consultations Mr Evans had attended the INN Consultations which had been held by videoconference over four days in April. Over 130 names had successfully been discussed.

National Pharmacopoeial Authority Meeting The annual NPA meeting had been held in June, attended by Mr Pound, Mr Gibb, Ms Ashraf and Dr Bowden.

IX REPORTS OF THE SECRETARY AND SCIENTIFIC DIRECTOR

406 **MHRA** Dr June Raine would be continuing in her role as interim Chief Executive of the MHRA until April 2021. Professor Sir Michael Rawlins, the Chair of the MHRA, would be standing down later in the year and interviews would shortly be held for his replacement.

407 **Independent Medicines and Medical Devices Safety (IMMDS) Review** The IMMDS Review ("First Do No Harm") was due to be published on 8th July.

X ANY OTHER BUSINESS

408 **Date of next meeting**

Monday 9th November 2020.

409 **Technology**

The April meeting had been held by Zoom, but this meeting had been held by Microsoft Teams, in line with MHRA policy.

FOR INFORMATION:

410 **Items for Future Meetings**

An updated list of items for discussion at future meetings was provided for information.